



Frederick K. Brewington  
Albert D. Manuel III  
Cobia Powell

Of Counsel  
Oscar Holt III  
Jay D. Umans

May 5, 2025

**VIA ELECTRONIC CASE FILING**

Honorable Nusrat J. Choudhury  
United States District Court Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

**Re:     *Etienne v. Locust Valley UFSD, Kimberly Gotti and Gianna Gotti***  
**Docket No.: 25-cv-00724 (NJC)(SIL)**

Dear Judge Choudhury:

As you are aware, we are the Attorneys representing the Plaintiffs in the above referenced matter. We write in response to the letter of Patrick C. Carroll, Esq. dated April 21, 2025 which was filed with the Court on May 1, 2025. Defendants seek relief from the Court in the form of an order requiring the disclosure from their co-defendants for discovery in the form of the entire Notice of Claim file. Upon our seeing that letter, we were clear that the Gotti Defendants were seeking this information without any attempt to meet and confer. While Defendants argue that there is a need for the Notice of Claim file and 50h transcript at this time, we disagree as there is no plausible argument that Defendants need the 50h transcript to formulate their Rule 12(b)(6) motion. Accordingly, we ask the Court to deny the Defendants' application at this point.

Respectfully submitted,  
*Frederick K. Brewington*  
FREDERICK K. BREWINGTON

cc:     All Counsel (Via ecf)  
FKB:cmp